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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
JAN 10 2023
SEAN F. MCAVOY, CLERK
DEPUTY

8 UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,

11
12 Plaintiff,

13 v.

14 STEVEN JOSEPH ZACHERLE,

15
16 Defendant.

2:23-CR-0007-TOR
INDICTMENT

Vios: 18 U.S.C. §§ 1111, 1153
First Degree Murder in Indian
Country
(Count 1)

18 U.S.C. § 875(c)
Threats in Interstate Commerce
(Count 2)

18 U.S.C. §§ 2261A(2)(B),
2261(b)(5)
Cyberstalking
(Count 3)

18 U.S.C. § 924(d)(1),
28 U.S.C. § 2461(c)
Forfeiture Allegations

26 The Grand Jury charges:

27 COUNT 1

28 On or about October 18, 2022, in the Eastern District of Washington, within
the external boundaries of the Confederated Tribes of the Colville Reservation, in

INDICTMENT – 1

1 Indian country, the Defendant, STEVEN JOSEPH ZACHERLE, an Indian,
2 willfully, deliberately, maliciously, and with premeditation and malice
3 aforethought, did unlawfully kill D.B., by striking him in the head and fracturing
4 his skull, all in violation of 18 U.S.C. §§ 1111, 1153.

5
6 COUNT 2

7 On or about October 18, 2022, in the Eastern District of Washington and
8 elsewhere, the Defendant, STEVEN JOSEPH ZACHERLE, knowingly and
9 willfully transmitted in interstate commerce electronic communications containing
10 a threat to injure the person of another, to wit: the Defendant, STEVEN JOSEPH
11 ZACHERLE, transmitted text messages and made telephone calls to Victim 1,
12 threatening, "I will kill people" and I "am going to kill someone," all in violation
13 of 18 U.S.C. § 875(c).

14 COUNT 3

15 On or about October 18, 2022, in the Eastern District of Washington, the
16 Defendant, STEVEN JOSEPH ZACHERLE, with the intent to injure and
17 intimidate Victim 1, used an electronic communication system of interstate
18 commerce to engage in a course of conduct that caused, attempted to cause, and
19 would be reasonably expected to cause, substantial emotional distress to Victim 1,
20 all in violation of 18 U.S.C. §§ 2261A(2)(B), 2261(b)(5).

21 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

22 The allegations contained in this Indictment are hereby realleged and
23 incorporated by reference for the purpose of alleging forfeitures.

24 Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon
25 conviction of an offense in violation of 18 U.S.C. §§ 1111, 1153, and/or 18 U.S.C.
26 875(c), as set forth in this Indictment, the Defendant, STEVEN JOSEPH
27 ZACHERLE, shall forfeit to the United States of America any property, real or
28 personal, which constitutes or is derived from proceeds traceable to the offense(s).

1 If any of the property described above, as a result of any act or omission of
2 the Defendant:

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with, a third party;
5 c. has been placed beyond the jurisdiction of the court;
6 d. has been substantially diminished in value; or
7 e. has been commingled with other property which cannot be divided
8 without difficulty,

9 the United States of America shall be entitled to forfeiture of substitute property
10 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

11 DATED this 10 day of January 2023.

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